



April 19, 1999

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Dockets Management Branch (HFA-305)
U.S. Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket No. 98P-0968

Dear Sir or Madam:

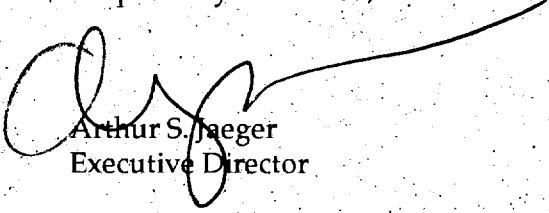
Public Voice for Food and Health Policy is pleased to support the Food and Drug Administration's proposed revision in labeling requirements for surimi and surimi-containing foods. These foods include imitation crab and lobster meat. The proposed change would permit "and/or" ingredient labeling for the species of fish used in these foods. The National Fisheries Institute has urged this more flexible ingredient labeling.

Current requirements say that surimi, a blended product often made from two or more fish species, must bear the name of each ingredient used. FDA notes in the proposed rule that this can increase production costs by requiring manufacturers to maintain and use multiple labels for what is essentially the same product. In addition, it can limit the availability of these products. Neither of these outcomes is in the interest of consumers.

The proposed change could result in slightly lower prices for consumers, as well as some improvement in conservation of the fish species involved. At the same time, because the process for making surimi "decharacterizes" the fish, the specific species used has little or no effect on the finished product's quality or nutritional value. More importantly, under the proposed change consumers will receive *no less* label information than under current rules. Labels will list all species that *might* be in the product, so that those who wish to avoid a specific species of fish can continue to do so. In this sense, the proposed label is "over-inclusive."

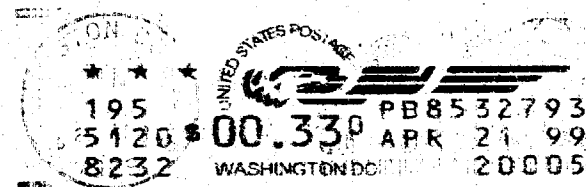
For all these reasons—the impact on cost and availability, the possible improvement in conservation, and the "over-inclusive" nature of the label change—Public Voice supports the proposed rule.

Respectfully submitted,


Arthur S. Jaeger
Executive Director

98P-0968

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